

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS,)	
)	
Plaintiff,)	C.A. No.: 04-1350 (GMS)
)	
v.)	
)	
DR. SYLVIA FOSTER, STAFF)	
MEMBERS, THE DELAWARE)	
PSYCHIATRIC CENTER and)	
MR. GREY,)	
)	
Defendants.)	

**DEFENDANT SYLVIA FOSTER, M.D.'S RESPONSE TO PLAINTIFF'S
"ADDITIONAL POINTS TO SUPPORT MOTION AND REQUESTING PERMISSION
TO AMEND THE COMPLAINT"**

COMES NOW, Defendant, Sylvia Foster, M.D., by and through her counsel, and hereby requests that the Court deny Plaintiff's Motion Requesting Permission to Amend the Complaint, pursuant to Rule 15.1, until such time as Plaintiff provides a copy of the pleading as amended with indications as to in what respect it differs from the pleading which it amends. Defendant Sylvia Foster also would request leave to object to the proposed amendment after having had an opportunity to view Plaintiff's proposed amendments to the Complaint.

RESPECTFULLY SUBMITTED,

REGER RIZZO KAVULICH & DARNALL, LLP

/s/ Cynthia G. Beam, Esquire
Cynthia G. Beam, Esquire
Delaware State Bar I.D. No. 2565
1001 Jefferson Plaza, Suite 202
Wilmington, DE 19801
(302) 652-3611
Attorney for Defendant Dr. Sylvia Foster

Dated: August 23, 2005

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS,)	
)	
Plaintiff,)	C.A. No.: 04-1350 (GMS)
)	
v.)	
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DR. SYLVIA FOSTER, STAFF)	
MEMBERS, THE DELAWARE)	
PSYCHIATRIC CENTER and)	
MR. GREY,)	
)	
Defendants.)	

ORDER

AND NOW, TO WIT, this ____ day of _____, 2005, having considered Defendant Dr. Sylvia Foster, M.D.'s Response to Plaintiff's "Additional Points to Support Motion and Requesting Permission to Amend the Complaint" and the Response thereto, if any:

IT IS HEREBY ORDERED that Plaintiff's proposed amendment to Complaint is hereby DENIED.

BY THE COURT:

The Honorable Gregory M. Sleet

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Plaintiff,)	C.A. No.: 04-1350 (GMS)
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MEMBERS, THE DELAWARE)	
PSYCHIATRIC CENTER and)	
MR. GREY,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify on this 23rd day of August, 2005 that two true and correct copies of Defendant Dr. Sylvia Foster's Response to Plaintiff's "Additional Points to Support Motion and Requesting Permission to Amend the Complaint" have been served by first class mail, postage prepaid, to the following:

Jimmie Lewis
SBI#506622
H.R.Y.C.I.
P.O. Box 9561
Wilmington, DE 19809

REGER RIZZO KAVULICH & DARNALL LLP

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